

THE NORTH CAROLINA STATE BAR
)
Plaintiff
v.

TONYA L. FORD, Attorney
Defendant
)

NOW COMES Defendant, Tonya L. Ford (hereinafter "Defendant"), and responding to Plaintiff's Complaint and alleges and says:

- 1. The allegations in paragraph 1 are admitted.
- 2. The allegations in paragraph 2 are admitted.
- 3. The allegations in paragraph 3 are admitted.
- 4. The allegations in paragraph 4 are admitted.
- 5. Although the allegations in paragraph 5 are admitted, the Defendant was in constant communication with the NC State Bar and was informed as to what her limitations were, while addressing the Continuing Legal Education requirement matter.
- 6. The allegations in paragraph six are admitted. After having completed and submitted all necessary documentation to the NC State Bar, Defendant was conditionally reinstated.
- 7. The Defendant reavers her Answers in paragraphs 1-6 as if set forth fully herein.

10. At this time, the Defendant is without sufficient information with which to form a belief as to the truth of the matters asserted in paragraph 10 of the Complaint, therefore they are deemed denied as a matter of law.

- 11. At this time, the Defendant is without sufficient information with which to form a belief as to the truth of the matters asserted in paragraph 10 of the Complaint, therefore they are deemed denied as a matter of law.
- 12. At this time, the Defendant is without sufficient information with which to form a belief as to the truth of the matters asserted in paragraph 10 of the Complaint, therefore they are deemed denied as a matter of law.
- 13. At this time, the Defendant is without sufficient information with which to form a belief as to the truth of the matters asserted in paragraph 10 of the Complaint, therefore they are deemed denied as a matter of law.
- 14. Defendant generally denies that any accounting and bookkeeping errors was for the purpose of misrepresenting or to intentionally violate the Rules of Professional conduct.
- 15. Defendant reavers her answer in paragraphs 1 through 14 as if set forth herein.
- 16. Defendant admits that she represented Darryl Piggott regarding a traffic ticket in Alamance County.
- 17. The allegations in paragraph 17 are admitted.
- 18. The allegations in paragraph 18 are admitted.
- 19. The allegations in paragraph 19 are admitted.
- 20. The allegations in paragraph 20 admitted.
- 21. The allegations in paragraph 21 are admitted.
- 22. The allegation in paragraph twenty two is admitted but Defendant denies that any accounting and bookkeeping error was for the purpose of misrepresenting or intentionally

accounting and bookkeeping error was for the purpose of misrepresenting or intentionally violating the Rules of Professional conduct.

- 24. Deny. Defendant generally and specifically denies that she used client funds in an illegal, criminal or unprofessional manner and did not violate the Rules of Professional Conduct nor did she engage in any conduct or take an action reflected adversely on her honesty, trust worthiness, or fitness as a lawyer or constituted dishonesty, fraud, deceit or misrepresentation or violation of any Rules of Professional Conduct.
- 25. The allegation in paragraph 25 is admitted.
- 26. The allegation in paragraph twenty six is admitted but Defendant denies that any accounting and bookkeeping error was for the purpose of misrepresenting or intentionally violating the Rules of Professional conduct.
- 27. The allegation in paragraph 27 is admitted.
- 28. The allegation in paragraph 28 is admitted.
- 29. Deny. Defendant generally and specifically denies that she used client funds in an illegal, criminal or unprofessional manner and did not violate the Rules of Professional Conduct nor did she engage in any conduct or take an action reflected adversely on her honesty, trust worthiness, or fitness as a lawyer or constituted dishonesty, fraud, deceit or misrepresentation or violation of any Rules of Professional Conduct.
- 30. The allegation in paragraph 30 is admitted.
- 31. The allegation in paragraph 31 is admitted.
- 32. The allegation in paragraph 32is admitted.
- 33. The allegation in paragraph 33 is admitted.
- 34. At this time, the Defendant is without sufficient information with which to form a belief as to the truth of the matters asserted in paragraph thirty four of the Complaint, therefore they are

At this time, the Defendant is without sufficient information with which to form a belief 36. as to the truth of the matters asserted in paragraph thirty six of the Complaint, therefore they are deemed denied as a matter of law. The allegation in paragraph 37 is admitted. 37. 38. The allegation in paragraph 38 is admitted. Deny. All clients received appropriate and entitled funds. 39. 40. The allegation in paragraph 40 is admitted. The allegation in paragraph 41 is admitted. 41. The allegation in paragraph 42 is admitted. 42. The Defendant admits that the settlement proceeds were deposited in the trust account. 43. The Defendant is without sufficient information with which to form a belief as to the truth of the remaining portions of the allegation, therefore that portion is deemed denied. The allegation in paragraph 44 is admitted. 44. 45. The allegation in paragraph 45 is admitted. The Defendant admits that she disbursed funds to herself for legal work rendered. She 46. denies that she disbursed more funds to which she was entitled. 47. The allegation in paragraph 47 is admitted. 48. Deny. The allegation in paragraph 49 is admitted. 49.

50. Deny. The client received all funds to which he was entitled.

51. The Defendant reavers her Answer in paragraph 1-50 as if set forth fully herein.

- 53. The allegations in paragraph 53 are admitted.
- 54. The allegations in paragraph 54 are admitted.
- 55. The allegations in paragraph 55 are admitted.

WHEREFORE, Defendant having answered Plaintiff's Complaint requests to be notified of the time and date of hearing and be allowed to present evidence in support of her responses herein.

Respectfully submitted this 14th day of January, 2011.

Tonya L. Ford

16 West Martin Street

Suite 604

Raleigh, NC 27601

The undersigned Defendant certifies that a copy of the Defendant's Answer was duly served upon the Plaintiff's Attorney by depositing a copy of the same in the United States mail, postage prepaid, and addressed as follows:

Mr. William Farrell North Carolina State Bar PO Box 25908 Raleigh, NC 27611

14th day of January, 2011.

Tonya L. Ford

16 West Martin Street

Suite 604

Raleigh, NC 27601